Unofficial Comment Form

Project 2023-01 EOP-004 IBR Event Reporting

**Do not** use this form for submitting comments. Use the [Standards Balloting and Commenting System (SBS)](https://sbs.nerc.net/) to submit comments on **Project 2023-01 EOP-004 IBR Event Reporting Standard Authorization Request (SAR)** by **8 p.m. Eastern, Wednesday, March 8, 2023.**

Additional information is available on the [project page](https://www.nerc.com/pa/Stand/Pages/Project-2023-01-EOP-004-IBR-Event-Reporting.aspx). If you have questions, contact Senior Standards Developer, Chris Larson (via email), or at 470-599-3851.

## Background Information

The proposed project will address the issue that reporting of generation loss events, per the current EOP-004, uses relatively large size thresholds more suitable for synchronous generation; however, NERC and the Regional Entities have analyzed multiple widespread solar PV loss events (some also involving other generation losses as well) across a large number of resources that did not meet the EOP-004 criteria, yet have highlighted systemic reliability risks posed by IBRs that should be reported by applicable entities. This project will modify the existing generation loss criteria so it is more suitable and appropriate for reporting IBR events and so it aligns with past large-scale disturbances analyzed by the ERO. Without these improvements, the ERO must lean on ad hoc reporting per the NERC Event Analysis Process, which is voluntary in nature and involves significantly longer reporting timelines. The EOP-004 standard should be aligned with this process from a reporting size criteria perspective. As reported in numerous ERO disturbance reports, access to data useful for event analysis and risk mitigation following large-scale disturbances has been challenging for IBRs. This has resulted in data unavailability and overwriting by affected facilities since the ERO Enterprise is unable to send requests for information in a timely manner (i.e., must wait for the brief report to be submitted by the associated Reliability Coordinator first). Improved reporting will enable quicker response to widespread IBR loss events and ultimately lead to improved performance of the generation fleet through more detailed analysis and coordination with affected entities, where applicable.

**Questions**

1. Do you agree with the proposed scope as described in the SAR? If you do not agree, or if you agree but have comments or suggestions for the project scope, please provide your recommendation and explanation.

[ ]  Yes

[ ]  No

Comments:

1. Provide any additional comments for the SAR drafting team to consider, if desired.

 Comments: